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18 *Attorneys for Plaintiff*
19 THEODORE TRAPP and the putative class

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 THEODORE TRAPP, on his own behalf and
23 on behalf of all others similarly situated,

24 Case No. 2:09-cv-00995

Plaintiff,

v.

25 BIG POPPA'S, LLC, a Nevada limited
26 liability company d/b/a BADDA BING
27 MEN'S CLUB, *et al.*,

**PLAINTIFF'S MOTION FOR LEAVE TO
FILE HIS RESPONSE IN OPPOSITION
TO THE MOTION TO DISMISS OF
DEFENDANTS DÉJÀ VU SHOWGIRLS
OF LAS VEGAS, LLC, LITTLE
DARLINGS OF LAS VEGAS, LLC, AND
LAS VEGAS ENTERTAINMENT, LLC
UNDER RULE 12(b)(6) AND THE
MOTION TO DISMISS UNDER RULE
12(b)(6) OR FOR MORE DEFINITE
STATEMENT UNDER RULE 12(e) OF
DEFENDANT D.2801 WESTWOOD, INC.
INSTANTER**

Defendants.

28 Honorable Lloyd D. George

29 Magistrate Judge Peggy A. Leen

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1 Plaintiff Theodore Trapp, respectfully moves the Court to file his response to Defendants
2 Déjà Vu Showgirls of Las Vegas LLC, Little Darlings of Las Vegas, LLC and Las Vegas
3 Entertainments LLC d/b/a Larry Flynt's Hustler Club's Motion To Dismiss Under Rule 12(b)(6)
4 (Dkt. No. 77) ("Déjà vu Motion to Dismiss" or "Déjà Vu MTD"); and Defendant D.2801
5 Westwood, Inc. D/B/A/ Treasures' Motion To Dismiss Under Rule 12(B)(6) Or For A More
6 Definite Statement Under Rule 12(E), (Dkt. No. 175). Attached hereto is a true and accurate copy
7 of the Plaintiff's Proposed Response in Opposition to the Motions to dismiss.

8 Dated: September 24, 2009

9 **THEODORE TRAPP**, individually and on behalf
10 of all others similarly situated

11 By: /s/ Rafe S. Balabanian
12 Rafe S. Balabanian (ARDC No. 6285687) (*Pro Hac Vice*)
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CERTIFICATE OF SERVICE

I, Rafey S. Balabanian, an attorney, certify that on September 24, 2009, I served the above and foregoing, *Plaintiff's Motion for Leave to File Response in Opposition to the Motion to Dismiss Under Rule 12(b)(6) of Defendants Déjà Vu Showgirls of Las Vegas, LLC, Little Darlings of Las Vegas, LLC, and Las Vegas Entertainment, LLC and the Motion to Dismiss Under Rule 12(b)(6) Or For More Definite Statement Under Rule 12(e) of Defendant D.2801 Westwood, Inc. Instanter*, by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record, via the Court's CM/ECF electronic filing system, on this the 24th day of September, 2009.

/s/ Rafey S. Balabanian